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and First Alert, Inc.*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Chapter 11

SEARS HOLDING CORPORATION, et al.¹,

Case No. 18-23538 (RDD)

Debtors.

(Jointly Administered)

**JOINDER OF RUBBERMAID INCORPORATED, IGNITE USA, LLC, SUNBEAM
PRODUCTS, INC., AND FIRST ALERT, INC. TO LIMITED OBJECTION OF
BONNIER CORPORATION TO NOTICE REGARDING INITIAL DISTRIBUTION
PURSUANT TO ADMINISTRATIVE EXPENSE CLAIMS CONSENT PROGRAM**

Rubbermaid Incorporated, Ignite USA, LLC, Sunbeam Products, Inc., and First Alert, Inc., (“Joining Parties”), by and through their undersigned counsel, Reno & Zahm LLP, hereby join (the “Joinder”) the Limited Objection of Bonnier Corporation to Notice Regarding Initial Distribution

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); McGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); Sears Brands Management Corporation (5365); and SRe Holding Corporation (4816). The location of the Debtors’ corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

Pursuant to Administrative Expense Claims Consent Program [Dkt. No. 6191] (the “Objection”). In support of their Joinder, the Joining Parties state as follows:

1. In addition to wholly supporting the arguments made in the Objection, the Joining Parties add that they timely filed and responded to every request of MIII, that MIII never disputed information provided or requested additional information.

2. Additionally, related parties to Joining Parties were included in the Initial Distribution. Joining Parties filed all of its responses to requests for information and support at the same time, in the same fashion. MII has given no explanation as to why some claims were included in the Initial Distribution and others were not.

3. No explanation has been provided to Joining Parties for the inclusions of some related claims and the exclusion of others, or for the calculations made in determining the Initial Distribution.

For the above stated reasons, the Responding Parties request that the Court enter an order compelling the Debtors to add the Joining Parties as participants (Ballot Nos. 182353801042293, 182353801041219, 182353801040669, and 182353801040671) in the initial distribution under the Administrative Claims Consent Program.

Date: December 13, 2019

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